

FILED

AUG 02 2017 *px*

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

JOSE FARIAS, also known as "Jay," and
EDUARDO YANEZ-BARRERA

Case Number:

17CR 530

Violations: Title 21, United States
Code, Sections 841(a)(1), and 846

UNDER SEAL

JUDGE BLAKEY

MAGISTRATE JUDGE ROWLAND

COUNT ONE

The SPECIAL FEBRUARY 2016 GRAND JURY charges:

1. Beginning no later than in or about July 2015, and continuing until at least November 23, 2016, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOSE FARIAS, also known as "Jay," and
EDUARDO YANEZ-BARRERA

defendants herein, did conspire with each other, Juan Contreras, David Contreras, Edgar Rodriguez Contreras, Jesus Alberto Martinez-Reyes, and with others known and unknown to the Grand Jury, to knowingly and intentionally possess with intent to distribute and distribute a controlled substance, namely, a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance, and a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1);

2. With respect to JOSE FARIAS, also known as "Jay," the offense involved one kilogram or more of a mixture and substance containing a detectable amount of

heroin, a Schedule I Controlled Substance, and five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance;

3. With respect to EDUARDO YANEZ-BARRERA, the offense involved five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance;

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

The SPECIAL FEBRUARY 2016 GRAND JURY further charges:

On or about November 20, 2016, at Channahon, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOSE FARIAS, also known as "Jay," and
EDUARDO YANEZ-BARRERA,

defendants herein, did knowingly and intentionally possess with intent to distribute a controlled substance, namely, five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION

The SPECIAL FEBRUARY 2016 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 21, United States Code, Sections 841 and 846, as set forth in this Indictment,

JOSE FARIAS, also known as "Jay," and
EDUARDO YANEZ-BARRERA,

defendants herein, shall forfeit to the United States of America any property which constitutes and is derived from proceeds obtained, directly and indirectly, as a result of the offense; and any property used, and intended to be used, in any manner and part, to commit and facilitate commission of the offense, as provided in Title 21, United States Code, Sections 853(a).

2. The property to be forfeited includes, but is not limited to a personal money judgment in the amount of approximately \$10,000,000, including approximately \$139,000 seized by law enforcement on November 20, 2016, from 23811 West Bluff Road, Channahon, Illinois.

3. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, the

United States of America shall be entitled to forfeiture of substitute property, as provided in Title 21, United States Code, Section 853(p).

A TRUE BILL:

FOREPERSON

ACTING UNITED STATES ATTORNEY